

MINISTRY OF AGRICULTURE, FISHERIES, BLUE AND GREEN  
ECONOMY

EMERGENCY AGRICULTURAL LIVELIHOOD AND CLIMATE RESILIENT  
PROJECT (EALCRP)

**Crisis Response Window (CRW)**

**ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN**

**RENOVATION OF THE NATIONAL ABATTOIR**

December 22, 2022



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## SECTION 1: INTRODUCTION

### 1.1 EALCRP Project Overview and Objectives

After the passage of Hurricane Maria on September 18, 2017, The Government of the Commonwealth of Dominica (GoCD) with funding from the World Bank Group commenced with the implementation of the Emergency Agricultural Livelihoods and Climate Resilience Project (EALCRP). The objectives of the EALCRP are to contribute to restoring agricultural livelihoods and enhancing climate resilience of farmers and fisher folks affected by Hurricane Maria in Dominica. Subcomponent B.1 of the EALCRP project aims to restore key public sector infrastructure and assets damaged by the hurricane and restore the essential public services that farmers livelihoods depend on, such as the Abattoir.

The overall objective of the project is to refurbish the parts of the National Abattoir that was damaged by hurricane Maria. Specific objectives:

- To process pigs and poultry meat products for local markets.
- To promote sustainable livestock production
- To promote value addition of livestock by-products specifically blood, chicken feet and offal

### 1.2 ESMF AND ESMP for the Project

The established Environmental and Social Management Framework (ESMF) for the project requires all project related activities, including sub-project activities to be reviewed and assessed to ensure that environmental and social impacts associated with their implementation throughout the project's life cycle are eliminated or mitigated. The Environmental and Social Management Plan (ESMP) is one of the safeguards instruments used to address the environmental and social risks of projects, and as a result this ESMP has been prepared. This ESMP describes the status and details of the project, due-diligence of the works accomplished to date, and the evidence and certification that the facility has and will continue to be undertaken in compliance with applicable World Bank safeguards requirements and laws of Dominica.

Based on the screening conducted for this project (**Annex 1**), an Environmental and Social Management Plan (ESMP) is required to identify and appropriately manage environmental, social, health and safety risks. This ESMP is prepared to provide processes that the implementing agencies (Local Government Authorities, and contractors/sub-contractors) will ensure that the Rehabilitation of the Abattoir is done in compliance with national and regional environmental regulations, and consistent with international best practices and World Bank environmental and social safeguards, as well as the project ESMF. Specifically, it will ensure the protection of workers and the community from environmental and social risks associated with the activities, such as waste management, health and safety, neighbouring community, the surrounding environment and providing timely and clear public information.

This ESMP will be disclosed at the project site and on the EALCRP website when cleared by the Bank, and the records of the disclosure will be documented and recorded. This Environmental and Social Management Plan for the Abattoir can be found at the Ministry of Blue and Green Economy, Agriculture and National Food Security website: <http://piu.agriculture.gov.dm/safeguards>.

## SECTION 2: PROJECT DESCRIPTION

### 2.1 Locations and Regional Setting

The Abattoir is located on Government owned land at Layou Park on Lot 27 in the central Agricultural Region and occupies 6.11 acres of land (Figure 1). The current land usage includes:

Description	Land Area
Green area and setback	2,775 sq. yd (0.573 acres)
Earth bank land conformation	3,774 sq. yd (0.779 acres)
Inner roads	1,298 sq. yd (0.268 acres)
Inhabited Area	3,321 sq. yd (0.686 acres)
Ravine protected area	3,874 sq. yd (0.800 acres)
General Service area	2,831 sq. yd (0.584 acres)
Area reserved for small ruminants	2,300 sq. yd (0.475 acres)
Area for pig slaughter house	3,335 sq. yd (0.689 acres)
Area for chicken slaughter house	6,073 sq. yd (1.254 acres)
Total acreage	6.11 acres

The Abattoir is centrally and ideally located approximately 20km from the main town, Roseau. The Abattoir has access to power, water, communication and easily accessible by road.

**Figure 1: Abattoir Site Layout**



### 2.2.1 Layou Park Community

Layou Park is a small community with approximately seventy –five inhabitants located about one mile west from the abattoir. Most of the inhabitants are farmers and conduct farm labour activities. The community has limited infrastructure namely electricity to affordable and available to only a few. DOWASCO water source is not available and the residents obtain their potable water from the nearby stream. Internet services is limited to cell phone and Digicel Communication. Income of the inhabitants is limited and they are considered to be of a lower class. There are two small grocery shops in the community adjacent to each other. A newly built hotel; equipped with twelve self-contain apartments, kitchen and conference centre, however, unfortunately not operational. The abattoir is the main source of employment for this small marginalized community.

The renovation of the abattoir, adds value and have a significant economic impact on the Layou Park residents. Employment generation is one of the most critical elements in boosting economic activity. The abattoir provides employment in numerous areas including butchering, security, sanitary engineers, processing, packaging, drivers, and office and maintenance workers. Currently there are nine residents employed at the abattoir. Training has been provided for most of these positions and the residents of the area especially those that were relocated were given first priority based on merit and qualifications. The indirect economic spill-over from employment has not been realized.

## 2.2 Project Details and Status

In 2012, the Government of Dominica embarked on the construction of a national abattoir. The abattoir was built with the overall objective to be the central processing area for the slaughtering of pigs and poultry (broiler) in order to maintain a high standard of quality throughout the market chain. The abattoir was constructed to attain EU certification and was completed in 2016 from financial assistance from the Venezuelan Government. The abattoir consists of two slaughterhouses, one for pigs and the other for poultry. Both slaughterhouses operate independently and have the capacity to process approximately 50 pigs and 4,000 birds daily for local consumption, with staff working an eight-hour shift.

On September 17, 2017, Hurricane Maria struck Dominica and devastated the small Island's already struggling Agricultural Industry. Livestock damage includes 45 percent of cattle, 65 percent pigs and over 90 percent chickens with an estimated value of EC\$ 8.68M (US\$3.21M). Much of the agricultural infrastructure and equipment was damaged or destroyed including buildings, animal husbandry facilities, agricultural roads and the Abattoir. The estimated damage to infrastructure as a result of the storm is EC\$ 95.6M (US\$ 35.43M). The abattoir sustained damage to the roof and flooring of the poultry slaughterhouse, water storage tank, incinerator house and pig holding area all which will be repaired by funds from the Emergency Agricultural Livelihood and Climate Resilient, Crisis Response Window.



The national Abattoir is pivotal in improving processing as the broiler and pig sector, as increasing the local production of quality meat and meat product will require safe slaughtering and processing of poultry and pork. Initially the abattoir will process 500 birds per hour expandable to 1000 birds per hour, and 50 pigs per day. This will enhance our food safety and increase capacity to export. Dominica, in 2019 imported a total of 75,698-day old chicks, in contrast 9,049,370 lbs of chicken parts at a CIF value of EC 19,130,383 was imported. Drumsticks, wings, and backs being the most imported parts. In 2019, 517, 885.654 lbs of Pork at a CIF value of EC 1,979,527 were imported from various external markets. This consisted primarily of pickled/salted snouts and tails and frozen ribs and feet. The rehabilitation of the abattoir would support the Government of Dominica's efforts to reduce the meat import bill and improve the local economy.

## 2.3 Designs and Layout of Slaughterhouses

The Abattoir was constructed using a modular system, which has been approved by European Union and meets all their certification standards. These modules have been designed to withstand hurricane force winds. The dimensions of the module 40 x 8 x 9.5 ft and 20 x 8 x 9.5 ft. The structure, built in steel, will be strengthened and braced with maritime transport. The enclosure is made up of 60 mm pu insulated panels ( $k = 0.37 \text{ w/m}^2\text{c}$ ) and hygienic interior finished in white lacquered galvanized sheets. The false ceilings are made up of 40 mm insulating sandwich panels, with both sides finished in white lacquered galvanized sheets.

All containers are insulated inwardly with pu sandwich panel, total thickness depending on process area or conservation area. This panel is glued directly onto the module outer steel sheet (500 x 500 mm exterior openings for disposal of waste). The doors will also be made of panel insulating material, windows will not be provided in the process and manufacturing modules.

The floors can resist up to 300 kg/cm<sup>2</sup>. These modules are approved internationally with the norm for shipping containers, with their corresponding stability tests. The installation of the modules on lightweight beams is to facilitate waste water drainage and thus guarantee the maximum criteria of food safety in meat industry. The work floor will be painted with a double finish coat epoxy resin with a 1% slope to the drainage points. Modules are provided with drains and sumps in the process areas. Sumps shall be syphon type and removable for easy cleaning. Ventilation is forced through autonomous air conditioning equipment installed on the walls of all the process areas.

Figure 2: Design of poultry slaughterhouse

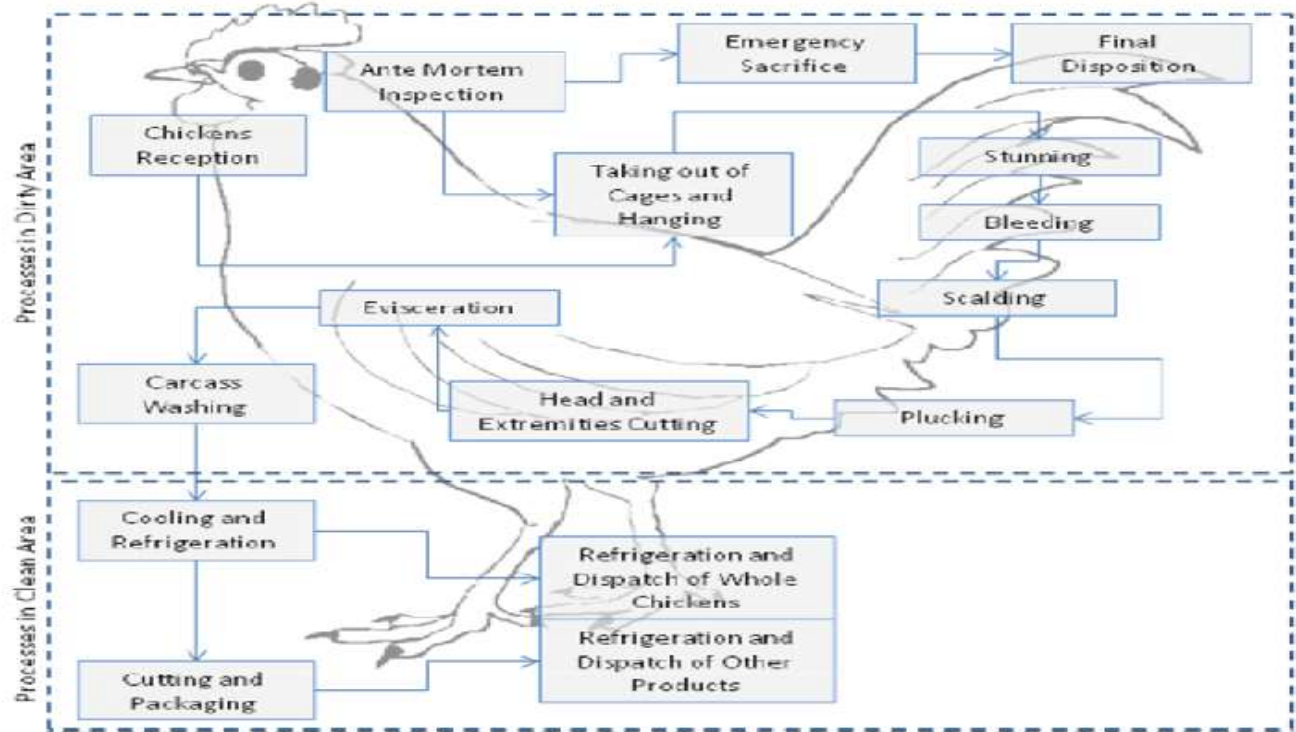
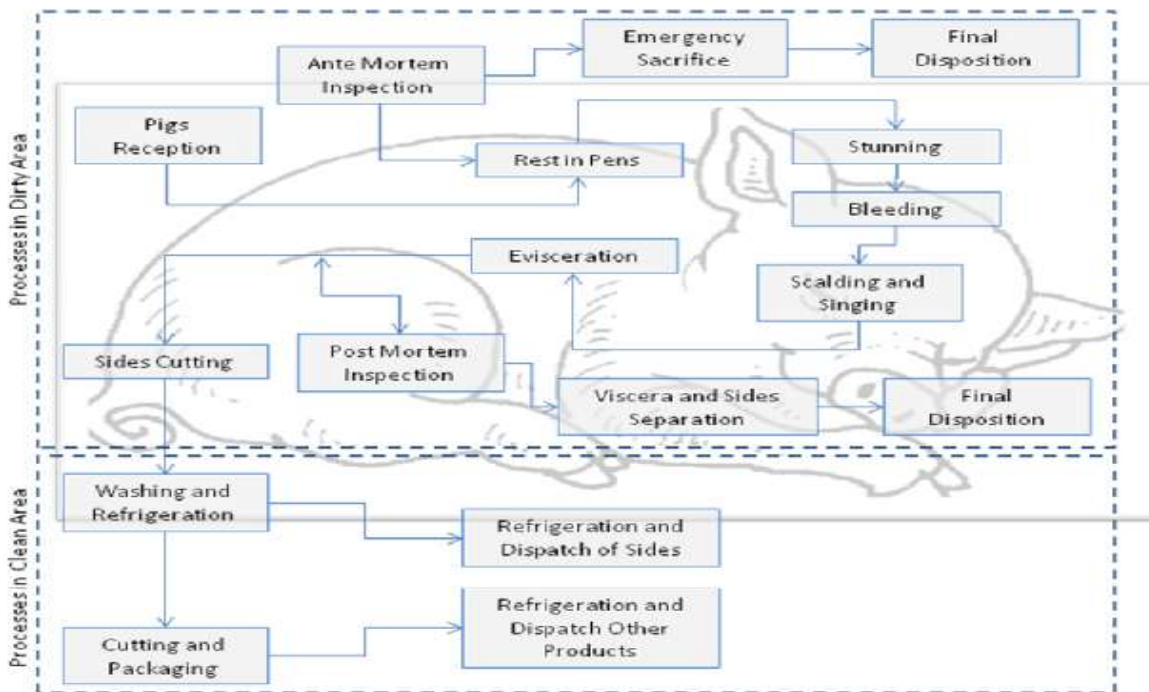


Figure 3: Design of pig slaughterhouse



## 2.4 Proposed Reconstruction Works

### 2.4.1 Poultry Slaughterhouse

Reconstruction works include the demolition (removal) of existing roof structure (timber-frame roof) and replace with a new roof structure. Note that the roof structure is an additional covering of the containerized poultry slaughterhouse which is for protecting the container roof from heat (energy conservation) and water (reduce rust). (see figure 4).

The entire damaged wooden floors will be replaced with zinc metal sheeting. (see figures 6 & 7).

The metal foundation will not require any additional works. (see figure 8).

The poultry holding pen which is the reception area for the birds will be covered, protecting the birds from heat and rain. (see figure 5).

Figure 4: roof of poultry slaughterhouse



Figure 5. poultry holding pen to be renovated



Figure 6 and 7. Damage wooden floors to be replaced with zinc metal sheet

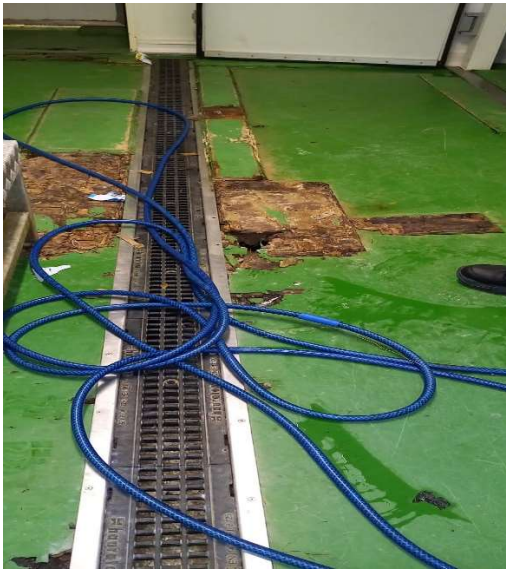
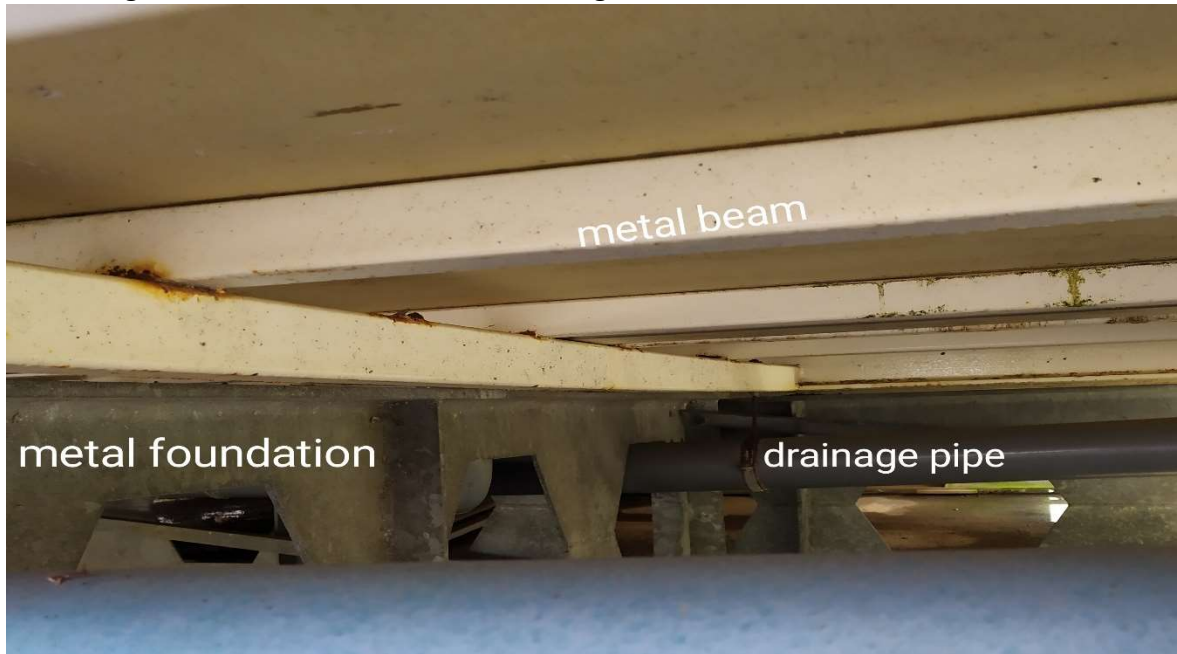


Figure 8. Metal foundation of the slaughterhouses



#### 2.4.2 Pig Slaughterhouse

Works to the pig slaughterhouse includes the removal of wooden floor and replacement with zinc metal sheet.

The roof of the pig holding area will also be renovated. see figure 9.

Figure 9. Roof replacement of the pig holding shed



#### 2.4.3 Generator and Incinerator shed

The metal shed housing for the incinerator and generator will be replaced with concrete column and roof. (see figure 10 below).

Figure 10. Incinerator and generator shed



## 2.5 Proposed Works for effective operation of the abattoir

The operation of the abattoir depends on the proper functionality of key equipment, ensuring the provision of a safe and wholesome product. A thorough assessment of the wastewater treatment plant, water purification system and generator need to be conducted.

### 2.5.1 Incinerator and Generator

The project is expected to purchase a new incinerator for the management of solid abattoir waste.

The generators need a thorough mechanical and electrical assessment prior to being repaired.

Figure 10. Generators



Figure 11. Incinerator



### 2.5.2 Water Storage Tank

The project will demolish the metal water tank and replace it with four 8000-gallon plastic tanks.

**Figure 12: Water storage tank**



### 2.5.3 Wastewater treatment Plant

An electrical assessment of the control panel of the wastewater treatment facility will need to be done to determine the extent of damage and repairs required to have the unit functional.

Figure 13. Septic tank with sewage and liquid waste and Figure 14. Faulty control panel responsible for the functioning of the water treatment plant



Figure 15. Sequencing batch reactor (SBR)(outside) Figure 16. SBR (inside)





#### 2.5.4 Water Purification System

The control panel for both the purification tank and chlorination tank were compromised by hurricane Maria and would also need an electrical assessment.

Figure 17. water purification tank



Figure 18. Chlorination tank



#### 2.5.5 Refrigeration and Cooling system

After slaughter, the pork and chicken must be kept chilled or frozen based on what the market desires. The abattoir is equipped with 2, forty feet (40ft) reefer containers that acts as back up and complements the faulty cooling system at both of the slaughterhouses. (See figure 19). Notwithstanding the reefer containers, the chillers and freezers within the slaughter houses needs to be functional, so that birds can be immediately chilled after slaughter and avoid moving dressed birds or carcasses outside to the reefer containers.

Figure 19. faulty cooling system



## SECTION 3: Legal and Administrative Framework

This ESMP is developed in line with relevant laws and regulations of Dominica and the World Bank Environmental and Social Standards (ESS) and Environmental, Health and Safety Guidelines. A more comprehensive review of Dominica's policy, regulatory and legal framework are described in detail in EALCRP ESMF. The current ESMP deals with those most relevant to the proposed rehabilitation such as covid-19 guidelines, waste management, physical planning, etc.

### 3.1 Relevant National Policies, Laws and Regulations

#### 3.1.1 Water and Sewerage Act (1989)

This Act stipulates that water management is vested in Dominica Water and Sewerage Company (DOWASCO) which includes among its functions water conservation and the preservation and protection of catchment areas. Responsibility for catchment areas is shared with the Forestry and Wildlife Division. These are the regulations which guide DOWASCO, who must be consulted with to ensure that adequate water and sewer capacity is available to accommodate all agriculture needs and activities as envisioned in the project.

#### 3.1.2 Solid Waste Management Act (2002)

Solid Waste Management Act (2002) is mandated by the Dominica Solid Waste Management Corporation (DSWMC). It sets out requirements for Waste Management licenses and permits. It prohibits the importation of waste and establishes liability and ownership of waste. It outlines requirements for the handling of waste, and provides for the management of used oil. It also addresses derelict motor vehicles, white goods and other scrap metal. The DSWMC is the authority responsible for the management of the landfill, where the majority of the projects waste will be disposed. The functions of the DSWMC are: (a) provided storage facilities for solid waste; (b) procure equipment for the collection, transportation and disposal of solid waste; (c) oversee the management of all solid waste collection and disposal systems in the State.

#### 3.1.3 Physical Planning Act (2002)

The Physical Planning Act (2002) provides inter alia for the orderly and progressive development of land and for the grant of permissions to develop land and for other powers of control over the use of land. This Act details the application and approval process which is executed through the Physical Planning Division of the Physical Planning and Development Authority. The Act states that 'No person shall carry out any development of land except under and in accordance with the terms of a development permission granted in that behalf prior to the commencement of such development. It makes provision for the Authority to consult with local authorities where such consultation is desirable in the interests of good planning. Further, 'Unless the Authority otherwise determines, environmental impact assessment shall be required in respect of any application for development permission to which the Second Schedule. Planning Division will review and approve all designs prior to renovation works.

#### 3.1.4 Water Catchment Rules of 1995

All water catchments are hereby declared to be protected forest. Prohibited from the protected forest are anyone who applies or stores pesticides; builds any hut for living places or livestock enclosure; burns, cut, fells, removes, takes any forest produce; capture, hunts or kills any bird unless he is a holder of a license to do so; carries out any planting other than reforestation on slopes over twenty degrees. Water is one of the most important resources and its source must be protected from contaminants. The sustainability of catchment areas has to be maintained to provide for the flora and fauna and promote biodiversity.

#### 3.1.5 Animal Disease Act

The Animal Disease Act controls the importation of animals, birds, reptiles and insects and to regulate the treatment and disposal of animals which are suffering or suspected to be suffering from disease. In the biological control of insect pest beneficial insects may be imported these insects must be free of disease and or parasites.

#### 3.1.6 Protection of Animal Act (1935)

This act provides for the prevention of cruelty to animals, the term animals include any domestic, captive or wild animal either bird, beast, fish, insect and reptile. Any of the following can be consider as form animal cruelty: beats, kicks ill-treat, overrides, over-drives, overloads, tortures, starves, terrifies animals or permits the unnecessary suffering.

#### 3.1.7 Employment Safety Act (No.3 of 1982).(Art .8.4)

“Employment Safety Act reorganizes the system under which safety and health at work are safeguarded and extends it in such a way that every employee is covered by this protection. In addition, provides for the establishment of consultative and advisory committees, as well as the appointment of safety officers. “

#### 3.1.8 Environmental Health Services Act 1997

This act is mandated by the Environmental Health Department and makes provision for the conservation and maintenance of the environment in the interest of health generally and in relation to places frequented by the public. This Act is very much applicable to the Abattoir in order to maintain a quality and wholesome product and waste management, to include wastewater and emission from the abattoir. The conservation and maintenance of the environment in the interest of health must be taken into consideration during operation works at the abattoir. The environmental Health Department conducts regular inspection of the slaughtering of pig and poultry.

## 3.2 Regulatory Institutions and Food Safety Regulations

Many countries and their producers utilize quality assurance programs to ensure that optimal levels of animal husbandry are maintained. Quality assurance programs should provide training for the owner, operator, and all staff and require written protocols for production practices, including those directed at animal well-being. Assurance programs should dictate continual review of existing systems and practices, especially as new science and technology become available and economically viable. Many quality assurance programs apply auditing or assessment procedures, the features of which will depend on the livestock operation, program, and region.

### 3.2.1 The Dominica Bureau of Standards (DBOS)

The Dominica Bureau of Standards is the National Standards Body as mandated by the Standards Act No. 4 of 1999. It is a statutory body under the guidance of the Ministry of Trade, Industry, Consumer and Diaspora Affairs and its general administration is guided by a 14-member National Standards Council (NSC) appointed by the Minister. Additionally, many persons can be drawn from government departments and ministries and the private sector to serve voluntarily on the Standards Technical Committees and Working Groups to assist with the National standardization effort. The Dominica Bureau of Standards develops, establishes, maintains and promotes standards for improving industrial development, industrial efficiency, promoting the health and safety of consumers as well as protecting the environment, food and food products, the quality of life for the citizenry and the facilitation of trade. The BOS plays a critical compliance and monitoring role in the safe operation of the abattoir.

### 3.2.2 Hazard Analysis of Critical Control Points (HACCP)

Hazard Analysis Critical Control Points (HACCP) is a system which provides the framework for monitoring the total food system, from harvesting to consumption, to reduce the risk of foodborne illness. The system is designed to identify and control potential problems before occurrence. The application of HACCP is based on technical and scientific principles that assure safe food, including meat from abattoir. HACCP focuses on three types of hazards; Biological hazards, chemical hazards, and physical hazards.

Biological hazards are the type of hazards that receive the most attention in the HACCP system and also present the greatest risk of severity and occurrence. Biological hazards include hazards from pathogens such as bacteria, viruses, yeasts, moulds, E. Coli, Listeria monocytogenes, Salmonella, Staphylococcus aureus, and Campylobacter. All of these pathogens possess high risk of infection at the abattoir if health standards are not in place and adhered.

Chemical hazards in meat products could result from mis-use of antibiotics in production, contamination with sanitizers or cleaning agents, or environmental contamination from hydraulic fluids.

Physical hazards are probably the most recognized by consumers as they usually find this hazard. Glass, metal, and plastic are physical hazards that can occur in meat products. Currently, the food industry, including foodservice, supports the use of HACCP and its principles as the best system currently available to reduce and prevent foodborne illness. Dominica has adopted the HACCP approach, through the Bureau of Standards as the regulatory agency requiring that meat and poultry processing plants have HACCP plans in place. Many state and local food regulatory agencies base their inspections on HACCP principles and may, in certain instances, require HACCP plans for specific food items. Food safety educators now use the principles of HACCP as the basis for their educational programs.

### 3.3 World Bank Environmental and Social Safeguards Policies

#### 3.3.1 World Bank Environmental and Social Safeguard Policies

The WBG has developed Safeguard Policies that guide the development of projects including the EALCRP. Accordingly, this ESMP was prepared for this project. World Bank Environmental and Social Policies triggered by the rehabilitation and continued operation of the abattoir includes Environmental Assessment (EA) and Environmental and Social Management Plan (ESMP). These safeguard policies identify, evaluate and manage the environment and social risks and impacts of the project in a manner consistent with the Operational and Bank Policies by adopting mitigation hierarchy approach to: (a) Anticipate and avoid risks and impacts; (b) Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels; (c) Once risks and impacts have been minimized or reduced, mitigate; and (d) where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.

Environmental, Health and Safety guidelines have also been prepared by the WB. There are general guidelines that cover most activities related to construction projects involving the rehabilitation of existing buildings or construction of new facilities. Some parts of these general guidelines are applicable to the project, particularly such aspects as COVID, dust and noise control, workers' health and safety, and poultry and pig processing. For more information refer to the EHS Guidelines on the WB website.<sup>1</sup>

#### 3.3.2 Environmental Health and Safety Guidelines for poultry processing

The Environmental, Health, and Safety (EHS) Guidelines are technical reference documents that cover all the procedures from the reception of live birds, slaughter, evisceration, and simple rendering or waste disposal. Environmental Health and Safety risks associated with the processing of poultry includes solid organic waste and by-products, wastewater, emission to air and energy consumption.

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<sup>1</sup>[https://www.ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/sustainability-at-ifc/policies-standards/ehs-guidelines](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines)

### 3.3.3 Environmental Health and Safety Guidelines for pig processing

The Environmental Health and Safety Guidelines for Meat Processing include information relevant to meat processing, focusing on bovine and porcine slaughtering and processing from reception of the animals until the carcasses are ready for sale or further processing. This document pertains to facilities that provide simple processing of the by-products of meat slaughtering.

These safeguard guidelines identifies, evaluates and manages the environment and social risks and impacts of the project by adopting mitigation hierarchy approach to: (a) Anticipate and avoid risks and impacts; (b) Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels; (c) Once risks and impacts have been minimized or reduced, mitigate; and (d) Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.

## SECTION 4: POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS

The construction activities for rehabilitation of the Abattoir is expected to occur over a four (4) month period and the operation phase is currently ongoing. The principal environmental and social impacts are expected to occur during the rehabilitation and operational period would be mainly those associated with typical reconstruction works, food processing operations, workers safety, disposal of abattoir waste and working conditions. Notwithstanding the numerous positive benefits expected to accrue from the project, the following negative environmental and social impacts have been identified for rehabilitating the Abattoir. Mitigation measures for each of the risks identified are presented in Section 5.

### 4.1 Reconstruction Phase

The existing site is classified as a 'brown field' and will not require clearing of vegetation, land acquisition or involuntary resettlement of any groups or individuals. Additionally, the facility is operational and physical works will be limited to demolishing (removal) damaged structures and repairing specific buildings and operational areas, in addition to purchasing an incinerator and generator.

According to local legislation, the replacement of structures and physical works will not require new permits from the Environmental Health Department or the Physical Planning Department, and will be limited to areas or sections of the existing building that are deemed unsafe due to structural concerns and need immediate repairs such as roof rafters, fascia boards, painting of buildings, steel frame fabrication, etc.). The construction works will be conducted during the regular work hours of 8 a.m. to 5 p.m. Monday to Friday. The replacement of structures will be undertaken manually and all waste materials will be taken to an approved dump site. To eliminate risk and impacts of demolition and reconstruction activities, the poultry slaughterhouse will be shut down for at least one months, providing sufficient time to complete replacement of the flooring with zinc metal sheets. While the poultry slaughterhouse is under renovation the pig slaughterhouse will be fully functional.

The following are the key reconstruction areas to be accomplished:

#### 4.1.1 Reconstruction Waste and debris

Reconstruction and demolition activities may pose significant hazards related to the stockpiling and removal of construction debris. Waste from the replacement of the poultry slaughterhouse flooring will be primarily wood, which will be separated from any scrap metal from the replacement of the roof of the poultry holding pen all waste will be dispose of at the landfill. Renovation works on the flooring of both slaughterhouses will be the replacement of the wooden flooring with zinc metal sheet. The zinc metal sheets will be placed on the metal frame foundation and all plumbing and drainage attached to the slaughterhouses will remain.

#### 4.1.2 Dust and noise from reconstruction or demolition activity

A minimal amount of fugitive dust from raw materials and noise from equipment is expected to be generated from the renovation works.

#### 4.1.3 Workers Health and Safety

The improper use of tools and equipment by construction workers are cause health and safety is issues. Mitigation measures against health risk are outlined in section 5.

#### 4.1.4 Disability Inclusion

The Project is keen to include people with disabilities into design and implementation of the project activities and prevent discrimination against disability. Discrimination on the basis of disability means creating a distinction, exclusion, or restriction which has the purpose or effect of impairing or excluding a person with disability from being on an equal basis with others, thereby potentially enhancing the negative impacts of the project or limiting project benefits or being able to voice comments or concerns during stakeholder engagement. The project will analyse and identify people with disabilities and provide opportunities 1) to include vulnerable and disadvantaged stakeholders in the information disclosure and consultation process in a meaningful way and 2) to include accessibility measures in project design, where financially and technically feasible, if disability risks and impacts have been identified as part of potential project impacts. Sound mitigation measures can result in not only an inclusive project, but demonstrate good international practice, and can raise awareness on disability issues and accommodating needs of vulnerable groups.

#### 4.1.5 Forced Labour

The Project will not use forced labour and/or child labour. The Contractor shall have in place, a grievance redress mechanism for workers to raise workplace concerns and grievances including instances of forced labour. If the Contractor is unable to develop and implement a grievance redress mechanism (GRM), workers will be directed to use the EALCRP PIU's GRM to register complaints, issues or concerns.

#### 4.1.6 Child Labour

No person under the age of 18 years will be employed or engaged in any project activity. Contractor will enforce Code of Conduct (see Annex 4) to prevent child labour; i.e., any person, 18 years or below, forced labour; persons working against their own free will, avoid discrimination especially of vulnerable groups and allow employees to raise workers concerned.

#### 4.1.7 Gender Based Violence

This project does not foresee and is not a high-risk project for SEA/SH cases. However, some cases such as that of sexual exploitation and sexual abuse/ sexual harassment (SEA/SH) are sensitive and may not be reported due to the risks of stigmatization, rejection and reprisals against survivors. This creates and reinforces a culture of silence and survivors may be unwilling to approach the authorities. Therefore, the contractor will need to put in place multiple channels for mitigating and registering complaints in a safe and confidential manner.



The Contractor should also include in the code of conduct (annex 4) measures to address sexual exploitation and abuse and sexual harassment incidents that may occur in the work place.

## 4.2 Operational Phase

The potential impacts of the abattoir's operations include wastewater, abattoir waste management, energy and water consumption, safety of workers and nearby communities, and emergency response. Air emissions from the incinerator and generator will create a certain degree of air pollution, which has to maintain at or below acceptable levels based on the World Health Organisation standards. Slaughtering equipment for the abattoir is not elaborate and expensive. The amount of equipment depends on the slaughtering procedures employed. All equipment is made of stainless steel which is rust resistant and easily cleaned and sanitized. Equipment which does not get in contact with the meat (e.g. overhead rails, working platforms, knocking pen) is made of other material i.e. galvanized steel.

### 4.2.1 Operational Processes at the Abattoir

The processing of birds and pigs takes place at the poultry slaughterhouse and the pig slaughterhouse respectively, where a series of activities occurs before a wholesome product is achieved. At the abattoir a series of mitigation measures are put in place to avoid, reduce and eliminate any source of pathogens in the meat.

### 4.2.3 Reception of animals

Upon arrival the pigs are weighed and driven through the corral to the holding pen. Information pertaining to the farm and the animal are recorded, this may include; date, time, animal condition, vehicle number, driver and animal code provided after weighing.

The cages used for the transportation of the birds should be suitable to avoid overcrowding of birds, between 6 to 9 birds per crate based on the size of the birds.

During the reception of the animal the veterinarian will conduct an antemortem inspection. Ramps and floors used to drive the animals are non-skid in nature. The pigs can remain in the holding area for up to a day without the intake of food. The pigs are cleaned before they are stunned.

### 4.2.4 Stunning/Hanging-birds

The animals are directed towards the stunning area, where birds are rendered unconscious through electro narcosis. Birds are hung from their legs then conveyed to the stunning area.

#### 4.2.5 Bleeding

Bleeding begins with the lift using shackles in one of the rear legs of the pig. A cut in an artery and in the cervical vein will allow the blood flow in a bleeding sink. Blood is collected in a hygienically condition using stainless steel containers. This process is done within six minutes.

#### 4.2.6 Scalding and de-hairing/Plucking-birds

The animals are then immersed in hot water between 60 °C and 62 °C to soften the bristles/feathers and be able to carry out mechanical dehairing/plucking. This is an area with a large number of microorganisms, therefore the hot water will be renewed continually and pots cleaned daily.

#### 4.2.7 Searing

Due to the small number of pigs, hair removal can be done manually by placing a flame on the animals' body. The pigs are then sprayed with cold water and are brushed by hand therefore eliminating any marks left by searing.

#### 4.2.8 Plucking-Poultry

After scalding, the birds are passed through a series of rubber pins where the feathers are removed and placed in the solid waste area.

#### 4.2.9 Evisceration

Evisceration is the extraction of all entrails (viscera) from the animal. For all species care must be taken in all operations not to puncture the viscera. All viscera must be identified with the carcass until the veterinary inspection has been passed. After inspection the viscera is chilled on racks etc. for better air circulation. The stomach and intestines are extracted followed by the kidneys, liver, lungs, heart and then the tongue. The pig is then split down the middle leaving the head to connect both sides until inspection has been approved by the veterinarian.

In the case of poultry; the head, feet and viscera are removed.

After the post-mortem inspection has been conducted the intestines and viscera suitable for consumption is cleaned and packaged. All other parts not suitable for human consumption are disposed of, via a fire pit. Once the incinerator is repaired all organic waste will be incinerated to ash which can then be used in agriculture. The carcass can now be separated and sides weighed, classified, stored and refrigerated (cooling).

#### 4.2.10 Cooling

After pre-cooling, the carcass is stored at temperatures between zero to five degrees Celsius. In the case of chicken, dressed birds are placed in the chill room at near zero degrees Celsius.

#### 4.2.11 Carving

Carving is basically cutting the meat into different cuts based on the market demands. This process is done under acceptable temperature controlled/hygienic conditions.

#### 4.2.12 Refrigerated meat

Chilled meat must be kept cold until it is sold or cooked. If the cold chain is broken, condensation forms and microbes grow rapidly. The same rules about not overloading, leaving space for air circulation, opening doors as little as possible and observing the highest hygiene standards when handling the meat apply. An ideal storage temperature for fresh meat is just above its freezing point, which is about 4°C.

#### 4.2.13 Vacuum

The abattoir is not equipped with vacuum pack facility.

#### 4.2.14 Storage and Transportation of meat

In storage, meat can be kept chilled at 4 °C or frozen between -10 to -20 °C. Based on the meat destination, it can be transported chilled at 4 °C or frozen between -10 to -20 °C.

### 4.3.1 Wastewater Management System

The wastewater disposal system consists of a series of chambers see chart 1 below depicting the treatment of wastewater. However, the waste disposal system control panel is not functional and therefore the abattoir has resorted to using an open pit system. Due to the limited processing of birds and pigs this method is sufficient to manage the liquid waste generated from the processing.

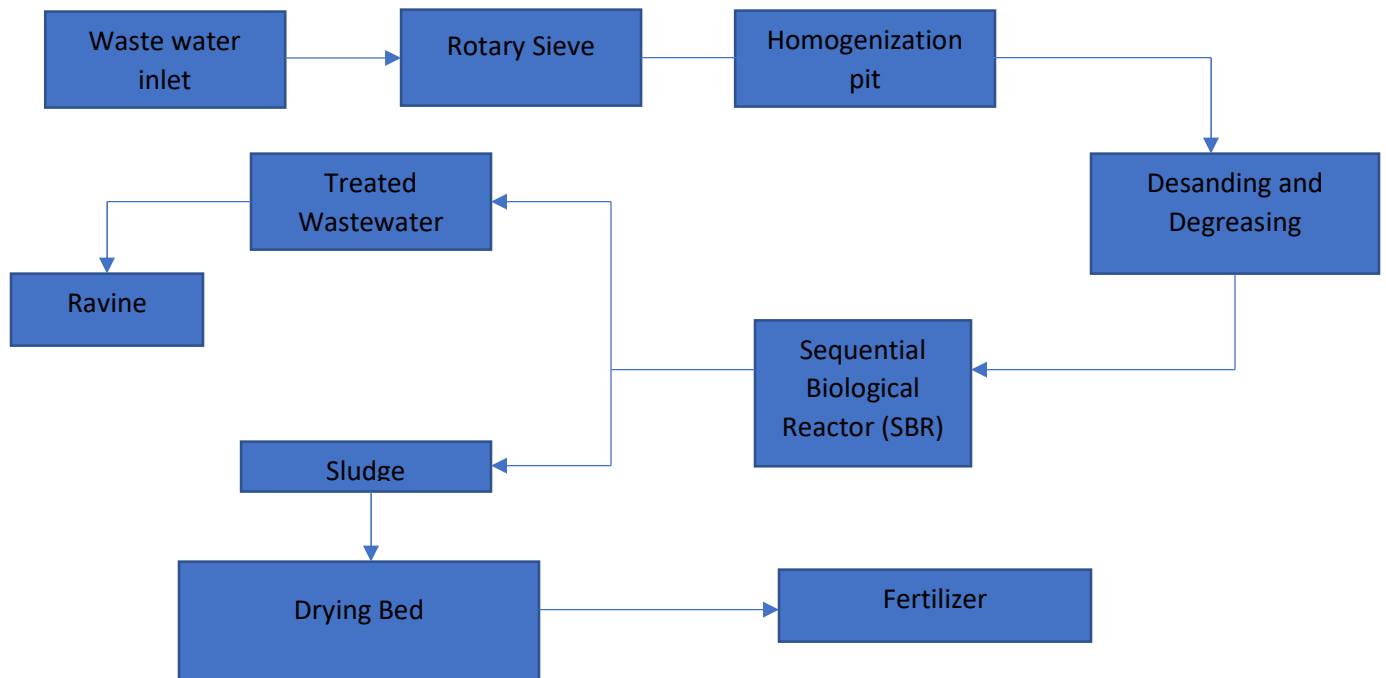
Waste water generated from the processing of pigs and poultry is drained to the homogenizing tank. Sewage from the offices and toilets in the slaughterhouses also drains into the same homogenizing tank (see figure 13). This is indicative of the high level of e.coli (880,000 CFU/100ml) in the downstream higher than that of the WHO recommended value of 200 CFU/100ml. This however, will be reduced once the necessary mitigation measures for the treatment of wastewater are in place (See table 2 in Annex 2).

The wastewater treatment plant is non-functional and as of such wastewater from the homogenizing tank cannot be pump to the sequencing batch reactor, where the breakdown of organic matter would occur. Therefore, all waste remains in the septic tank, increasing the risk of contaminating the nearby stream especially in times of heavy rainfall and in general allowing for a very unsanitary condition.

Figure 20. Pipes from homogenizing tank to the sequencing batch reactor (SBR)



Chart 1. Design of Wastewater Treatment Plant



#### 4.3.2 Solid Waste Management

The Abattoir wastes consist of several pollutants such as feathers, offals, animal faeces, blood, bone, fat, animal trimmings and paunch content. Abattoir wastes can have a detrimental effect on the environment, public health, animal health and economy of the country if they are not effectively managed and controlled. The Abattoir has been burning the waste using wood as the fuel source. This method of disposing waste from the abattoir is very labour intensive since the wood, primarily pallet has to be collected and transported to the abattoir ever so often. Further to this, the pallets used are treated and releases pollutants in the air without being mitigated. Secondly, on many occasions' fuels are used to further burn the waste as it is composed of large amounts of moisture.

Pollution control systems are incorporated in the incineration of waste and specifications of such are outlined under the mitigation section.

Figure 21. Burn pit



Figure 22. Residues (ash) from burn pit



#### 4.3.1 Abattoir Water Purification System

The water purification system is non-functional and as of such cannot purify water from the water intake. The abattoir is not connected to the Dominica Water and Sewage Company system and therefore operates using stream water for all its cleaning and washing activities. Water from the streams enter to a storage tank before being fed into a water purification system. Dominica can boast of its clean stream water suitable for clearing of carcasses. Water from the stream is not potable and as of such should not be consumed.

During periods of heavy rains, the water intake may be block by debris such as leaves and soil and has to be cleaned -out. In such cases the turbidity will be high and the water cannot be used for cleaning the carcasses.

### 4.4 Social Impacts

#### 4.4.1 Forced Labour

The Project will not use forced labour and/or child labour. The Contractor shall have in place, a grievance redress mechanism for workers to raise workplace concerns and grievances including instances of forced labour. If the Contractor is unable to develop and implement a grievance redress mechanism (GRM), workers will be directed to use the EALCRP PIU's GRM to register complaints, issues or concerns.

#### 4.4.2 Child Labour

No person under the age of 18 years will be employed or engaged in any project activity. Contractor will enforce Code of Conduct (see Annex 4) to prevent child labour; i.e., any person, 18 years or below, forced labour; persons working against their own free will, avoid discrimination especially of vulnerable groups and allow employees to raise workers concerned.

#### 4.4.3 Gender Based Violence

This project does not foresee and is not a high-risk project for SEA/SH cases. However, some cases such as that of sexual exploitation and sexual abuse/ sexual harassment (SEA/SH) are sensitive and may not be reported due to the risks of stigmatization, rejection and reprisals against survivors. This creates and reinforces a culture of silence and survivors may be unwilling to approach the authorities. Therefore, the contractor will need to put in place multiple channels for mitigating and registering complaints in a safe and confidential manner.

The Contractor should also include in the code of conduct (annex 4) measures to address sexual exploitation and abuse and sexual harassment incidents that may occur in the work place.

## SECTION 5: MITIGATION MEASURES

This section of the ESMP provides the mitigation measures to address each of the environmental and social risks identified in Section 4. Detailed/specific mitigation measures are provided in sections 5.1 and 5.2 below for reconstruction and operational phases respectively.

### 5.1 Reconstruction Phase

Aspect	Potential Impacts	Proposed Mitigation Measures
Reconstruction Waste and Debris	<ul style="list-style-type: none"> <li>○ Improper storage and/or disposal of materials</li> <li>○ Dispersion of materials in nearby canals, ditches, rivers, streets and adjacent properties</li> </ul>	<ul style="list-style-type: none"> <li>○ The contractor shall handle construction material debris and solid waste in accordance with approved procedures of Dominica Solid Waste Management Corporation (DSWMC).</li> <li>○ Construction wastes must be stockpile away from circulation areas and not pose safety hazards to workers and farmers; wastes must be stored in containers and removed from the site on a regular basis; containers must not overflow.</li> <li>○ The contractor should only dispose of materials in areas approved by the DSWMC.</li> <li>○ Collect and segregate wastes based on their classification and ensure disposal by the DSWMC.</li> <li>○ No burning of waste material</li> </ul>

Aspect	Potential Impacts	Proposed Mitigation Measures
		<ul style="list-style-type: none"> <li>○ Ensure appropriate and safe disposal of contaminants such as fuels, construction materials and wastes.</li> <li>○ In case of accidental waste spills, the relevant environmental authority shall be informed, and restoration measures shall be applied.</li> <li>○ Workers will be issued PPEs to include helmets, ear plugs, face shield, goggles, gloves, safety shoes etc.</li> <li>○ Provide PPE`s including hearing protection when working around machinery noise exceeds 85 dB; wear dust masks / respirators.</li> <li>○ Prevent unauthorized persons or farmers access to the construction site.</li> <li>○ Ensure immediate cleaning of any spills and remediation of contaminated areas after construction.</li> </ul>
Dust and noise from construction or demolition activity	<ul style="list-style-type: none"> <li>○ Poor air quality due to emissions from vehicles and dust generated</li> <li>○ Respiratory impacts to Abattoir and construction workers</li> <li>○ Noise generation from construction activities with its impact on workers.</li> </ul>	<ul style="list-style-type: none"> <li>○ Dust suppression methods such as wetting materials or slowing work should be employed as needed to avoid visible dust from construction activities</li> <li>○ PPEs - Dust masks / respirators when working in demolition areas, etc.</li> <li>○ PPEs - Hearing protection for working around machinery where the noise exceeds 85 dB</li> </ul>



Aspect	Potential Impacts	Proposed Mitigation Measures
		<ul style="list-style-type: none"> <li>○ Maintain vehicles and Contractor's machinery according to maintenance requirements.</li> </ul>
Worker health and safety	Workers accidents on the construction site	<ul style="list-style-type: none"> <li>○ Train workers on prevention of accidents and managing incidents.</li> <li>○ Ensure adequate segregation between construction and operational areas</li> <li>○ Provide first aid kit and emergency plan for accidents or incidents.</li> <li>○ Proper supervision of the construction workforce.</li> <li>○ Contractors must develop and implement Standard Operation Procedures - SOP for the most hazardous activities, such as excavation and trenching, working on heights (ladder or scaffolding), among others.</li> <li>○ Contractors must also develop a Job Hazard Analysis and convene Daily Safety Talks.</li> </ul>
Workers sexual exploitation, sexual abuse and sexual harassment	Physical, psychological or sexual abuse of project workers	<ul style="list-style-type: none"> <li>○ Contractor is required to develop and implement a Code of Conduct reflecting community, health and safety prevention and mitigation measures, including, inter alia, prevention of gender-based violence and sexual exploitation and abuse.</li> </ul>

Aspect	Potential Impacts	Proposed Mitigation Measures
		<ul style="list-style-type: none"> <li>○ GRM to deal exclusively with those grievances that involve workers employed by the Contractor for construction should be in place before start of works.</li> </ul>
Labour and working conditions.	unfair treatment and discrimination and unequal opportunity of project workers	<p>GRM and specific Labor Management procedures applicable to Works contracts should be in place prior to commencement of works and enforced throughout project implementation.</p> <p>Contractor will enforce Code of Conduct (see Annex 3) to prevent child labour and forced labour, avoid discrimination especially of vulnerable groups and allow employees to raise workers concerned.</p>

5.2 Operational Phase

Aspect	Potential Impacts	Proposed Mitigation Measures
Wastewater Treatment	Discharge of wastewater to nearby stream during the operation of the Abattoir.	<ul style="list-style-type: none"> <li>○ Replace wastewater treatment system aerobic/anaerobic digester to achieve compliance with local wastewater standards.</li> <li>○ Replace control panel of the waste water treatment plant</li> <li>○ Additional, wastewater treatment measures such as installation of grease traps in drains, collection of blood and offal from animal</li> </ul>

Aspect	Potential Impacts	Proposed Mitigation Measures
		processing to reduce solids volume in wastewater and its composition.
Potable Water	Contamination through the use of contaminated water	<ul style="list-style-type: none"> <li>○ Connect to the DOWASCO and having a constant supply of safe drinking</li> </ul>
Sewage	Contamination of the stream with human fecal matter	<ul style="list-style-type: none"> <li>○ Installation of plumbing for septic tank and soakaway system, allowing for the separate treatment of human and abattoir waste.</li> <li>○</li> </ul>
Storm water runoff	Increase turbidity (silt, very tiny inorganic and organic matter) of the Neiba River	<ul style="list-style-type: none"> <li>○ Install guttering to aid in the diversion of rainwater to storm drain</li> <li>○ Construct drains to direct water along the natural drainage regime and where possible discharge to the Neiba River.</li> </ul>
Wastewater Management	Improper disposal and treatment of wastewater	<ul style="list-style-type: none"> <li>○ Portable sanitary units will be established to collect and dispose of human wastes. Human waste will be disposed at sewage treatment facility to comply with local laws and regulations of Dominica.</li> </ul>
Abattoir Waste Management	<p>Improper disposal of Abattoir processing waste</p> <p>Air pollution</p>	<ul style="list-style-type: none"> <li>○ Install and commission incinerator to destroy condemned animals/meat, carcasses and other related animal wastes.</li> <li>○ Ash generated from the incinerator will be appropriately stored and used as soil amendments.</li> <li>○ Incinerator will be equipped with low NOx Burners</li> <li>○ Stack height of incinerator must be made with stainless steel with a minimum height of 3 meters</li> <li>○ Incinerator must be equipped with a secondary chamber to retain and re-burns the exhaust gases for minimum of 2 seconds at 850°C to meet EU guidelines.</li> <li>○ Specifications for incinerator and generators will be to reduce air</li> </ul>

Aspect	Potential Impacts	Proposed Mitigation Measures
		emission to less than 10 µg/m <sup>3</sup> particulate matter (PM <sub>2.5</sub> ) <sup>2</sup> <ul style="list-style-type: none"> <li>○ Reduce scalding start-up time and shutdown frequencies by scheduling slaughter times</li> <li>○ Plant fruit trees and tree crops as part of the landscaping activity and to help sequester carbon.</li> </ul>
Occupational health and safety	Worker/employee accidents/injury on property.	<ul style="list-style-type: none"> <li>○ Train new staff how to slaughter pigs and poultry safely and provide refresher course on available new techniques, use PPE and ensure there is adequate supply</li> <li>○ Regularly monitor performance and conduct maintenance of equipment</li> <li>○ Ensure compliance with Occupational Safety &amp; Health Act regulations</li> <li>○ Ensure compliance with Bureau of Standards</li> <li>○ Develop an Emergency Response Plan and provide a standard First Aid Kit throughout key operation areas.</li> </ul>

The Contractor will be required to conduct a Job Hazard Analysis to identify risks and hazards along the process of completing demolition and construction works. Once risks are identified the contractor should put measures in place to reduce those risks, Specifically, the contractor will be responsible to provide the appropriate PPE, such as safety boots, helmets, reflector vest, gloves, protective clothes, dust masks, goggles, and ear protection at no cost to the workers. A well-stocked first aid kit equipped with medication and supplies to treat basic construction related injuries, must be available to workers. Prior to contract signing the Contractor will also be required to prepare and submit a Code of Conduct to the EALCRP PIU for review and acceptance.

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<sup>2</sup> site ([https://www.who.int/news-room/fact-sheets/detail/ambient-\(outdoor\)-air-quality-and-health](https://www.who.int/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health))

## **SECTION 6: PROJECT MANAGEMENT & INSTITUTIONAL ARRANGEMENTS**

### **6.1 ESMP Implementation Responsibilities**

The overall responsibility of ensuring that the mitigation measures under this ESMP are implemented are with the EALCRP Project PIU, Project Manager, Environmental and Social Safeguards Specialists. The PIU environmental and social specialists will be responsible for the day-to-day activities in instructing and monitoring compliance with World Bank safeguards and the relevant laws of Dominica, including the ESMP.

The mitigation measures are to be executed by the contractor (renovation phase), and Abattoir Employees (operation phase) supervised by the Livestock Development Unit (LDU) and the Environmental Health Department (EHD). The Environmental Management Plan must be fully incorporated with the overall project management efforts at renovation and operation phases.

### **6.2 Contractor Responsibilities**

Engagement of Contractors will be managed by the EALCRP Project PIU. Standard environmental and social and health and safety related clauses will be developed and appended to or incorporated into bidding documents and contracts and shall remain in compliant throughout the contract period.

For purposes of cost estimation and budgeting, the contractors will be made aware of the existence of the environmental mitigation measures and associated ESMP requirements, which will be part of the bidding documents, and include cost items for such purposes in their proposals.

### **6.3 Supervision, Monitoring and Reporting**

It is the responsibility of the EALCRP Project PIU to ensure that the ESMP is being followed by the contractor(s) and site workers.

During the rehabilitation phase, environmental and social monitoring will be carried out by the Contractor, with support from the Project Engineer who is engaged to provide oversight on technical aspects. In addition, the Project Engineer will be required to prepare and submit reports (monthly to the EALCRP PIU Project Manager. These reports provide update on construction works to include; overall project timeline completion status, action items, project risk, issues and mitigation plans. The Environmental Safeguard Specialist will also conduct on site monitoring on a monthly basis ensuring that all safeguards guidelines are adhered to and the Contractor complies to this ESMP.

During operation phase, environmental management and monitoring will be the responsibility of a proposed Environmental Health and Safety committee (EHS) to be set up to assist with the monitoring measures established in this ESMP. This proposed committee will comprise of members from the EHD, LDU, BOS (Bureau of Standards) and DOWASCO. The EHS will be responsible to look after the implementation of the proposed mitigation measures and to enhance the positive impacts. The committee will work on occupational health and safety issues and will train and raise the awareness of the workers periodically. It will also be its responsibility to enforce the proper use of personal protective equipment,

observation of safety rules by all workers of the abattoir and regular monitoring of effluents. Every quarter, two water samples will be taken one upstream and the other downstream of the abattoir discharge point. Acceptable water quality limit taken from upstream would be zero e.coli in 100ml of water.

Currently, all these organisations are working in collaboration with the abattoir management in monitoring and addressing health and safety issues. The EHD ensures all waste management protocols are adhered to and Abattoir Employees are certified in the processing of meats. The Bureau of Standards (BOS) conducts hygienic check on the slaughtering processing, including temperature and sanitary conditions along the entire chain from stunning to cooling and packaging. The LDU conducts antemortem inspection and ensures that the production end is up to standards. The Dominica Water and Sewage Company Limited conducts water analysis on the intake and wastewater, as requested by abattoir management.

## SECTION 7: STAKEHOLDER ENGAGEMENT

### 7.1 Disclosure of ESMP and Community Outreach

Stakeholder engagement is the continuing and iterative process by which the PIU identifies, communicates and facilitates a two-way dialogue with the people affected by EALCRP’s decisions and activities, as well as others with an interest in the implementation and outcomes of the project. The PIU will provide stakeholders with timely, relevant, understandable and accessible information and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. Beneficiaries’ feedback will be recorded and responded to during the consultation sessions and throughout the project cycle.

#### Stakeholder Matrix

<b>Stakeholder</b>	<b>Information Needs</b>	<b>Characteristics of Stakeholder</b>	<b>Notification Channels/Announcements</b>
Government Ministries <ul style="list-style-type: none"> <li>• Bureau of Standards (National Centre for Testing Excellence)</li> <li>• Livestock</li> </ul>	Technical information on how the project will work; the type of support and technical competence required by government entities;.	Source of technical information and support	Website, emails, Memos, telephone, Zoom, round table meeting, Hard copies of safeguard documents, powerpoints and

Development Unit • Agriculture (EALCRP)			social media
• Livestock Producers	Simple non-technical information on the project in an engaging and easy to read manner on the proposed benefits; what is needed from them; how could their knowledge be used in the development and implementation of the project etc.	Provide support as a collective group and have bargaining power	Group meetings, Chart groups, emails, website, powerpoint presentations and radio announcements,

The following stakeholders were consulted for this activity:

- Chief Veterinary Officer
- Operation Manager of the Abattoir
- Dominica Bureau Of Standards
  - National Center for testing Excellence (NCTE) for conformity Assessment
- Farmers - Livestock farmers will be consulted on the proposed renovation activities to receive feedback and recommendations to ensure that facility will be able to receive and animals for slaughtering.
- Animal Health and Production Officer (AHPO) for the West Agricultural Region
- Chief Environmental Health Officer

<b>Beneficiary/stakeholder type</b>	<b>Issues raised</b>	<b>Responses provided by the project team.</b>
National Centre for Testing Excellence	Food Safety and Quality	Development of HACCP plans
Livestock Development Unit	Maintenance plans for equipment and machinery, including incinerator, generator, cooling system and processing equipment  Management of Solid Waste	Development of maintenance plan  Replace incinerator

	<p>Management of Wastewater</p> <p>Stormwater drains</p> <p>Scope of works for slaughterhouses</p> <p>Energy</p>	<p>Control panels for wastewater treatment plant needs to be replaced</p> <p>wastewater does not enter the river. Currently, the wastewater enters into a waste treatment pond and sinks into the ground</p> <p>Stormwater enters into the stream</p> <p>To replace each of the slaughterhouses with steel frame building</p> <p>Generator need repair</p>
Project Engineer	Storage of water	Build two 5000 gallons ferrocement water storage tanks and demolish metal frame water tank

7.1.1 Ongoing Stakeholder Consultations

As the project progresses, more stakeholder consultations will be conducted to ensure that throughout the entire process the stakeholders are actively involved. Prior to the rehabilitation of the abattoir, the PIU Safeguards plans to conduct two consultations one before and after construction. The Stakeholders for the consultations will include the abattoir employees, members of the Layou Park Community, Environmental Health Department, Livestock Development Unit, Bureau of Standard, a few merchants, key members of the Kalinago Territory such as the Chief and Council members and a few major pig and poultry producers. Young farmers interested in livestock production will also form part of this stakeholder engagement. The areas of discussion will be health and safety at the abattoir and the renovation works to be undertaken. Both consultations will take place within the first quarter of 2023.

On December 21<sup>st</sup> 2022 stakeholder consultation was held with the Staff of the abattoir and some of their concerns were that of inadequate protective gears while operating such as respirators, elbow length gloves, helmet, coats when entering the freezer (freezer coats). Additionally, they expressed the need for fully functional equipment since some of the equipment are out of commission.



This ESMP once cleared by the Bank,  
will be disclosed on the EALCRP webpage <http://piu.agriculture.gov.dm/safeguards>

The following Office below will be provided with the link for this ESMP:

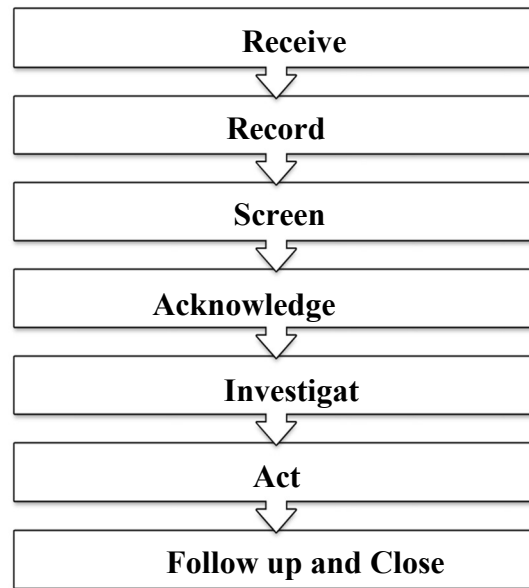
**Office of the Project Manager**  
**Emergency Agricultural Livelihoods and Climate Resilience Project**  
**19 King George V St., Roseau**  
**Commonwealth of Dominica**

**Office of the Chief Veterinary Office**  
**Livestock Development Unit**  
**Botanical Gardens**  
**Roseau**

**The Operations Manager**  
**National Abattoir**  
**Layou Park**

## 7.2 Grievance and Redress Mechanism

The project and its associated activities may have some short term and reversible impacts. In order to ensure the implementation of the Project in a timely manner and effectively address any anticipated and unanticipated risks that would be encountered during implementation, including the development of the necessary actions of mitigation and avoidance, a robust project Grievance Redressal Mechanism (GRM) has been implemented. The Grievance Mechanism for the project will be the same as that used in the EALCRP Project.



The GRM will enable the EALCRP PIU to address any grievances against this specific project activity. It must be noted that this GRM covers grievances that relate to the impacts that the project may have on contracted labour, farmers, Abattoir employees and communities. The PIU will be responsible for registering, tracking, addressing and resolving any complaints raised by individuals or groups. The required grievance reports will report issues and will include a name, date and contact information with a detailed description of the case and complainant. Complaints can be submitted to the EALCRP PIU through various channels:

- **Email:** A complainant can email the EALCRP PIU to complain. Complainant will receive email acknowledging complaint and be advised to complete a grievance form and sign (electronic or by reporting to nearest office). Anonymous complaints will also be accepted.
  - Project Manager, Email: [stephensonke@dominica.gov.dm](mailto:stephensonke@dominica.gov.dm)
  - Environmental Safeguards Specialist, Email: [mcintyrem@dominica.gov.dm](mailto:mcintyrem@dominica.gov.dm)
  - Social Safeguards Officer, Email: [sylvesterk@dominica.gov.dm](mailto:sylvesterk@dominica.gov.dm)
- **Write a letter:** to the EALCRP PIU, Project Manager, Emergency Agricultural Livelihoods and Climate Resilience Project (EALCRP), 19 King George V St., Roseau, Dominica to complain (respond to letters via telephone or email, inviting complainant to complete an official grievance form/transfer information from letter to grievance form; record complaint in log)
- **Telephone: Complainants can call the EALCRP PIU at (767) 266 3998**

- **In Person:** Complainants can report to the EALCRP PIU office at 19 King George V St., Roseau, Dominica, to complete and submit a grievance form. They can also register their complaint directly to the Environmental and Social Safeguards Specialists.
- **Anonymous Complaints:** are accepted through all above-mentioned channels. Complainants can submit their grievances without providing personal contact information.
- **PIU Project Manager or Staff Complaints:** Complainants can telephone, email or write letters to the Permanent Secretary, Ministry of Blue and Green Economy and Agriculture and National Food Security.

The EALCRP PIU will communicate the GRM procedure to its external and internal stakeholders to raise awareness and offer transparency of how stakeholders can voice their grievances.

## SECTION 8: ANNEXES

### Annex 1: Screening Tool for E&S Risks

The form below identifies potential impacts of the proposed activities envisioned under Emergency Agricultural Livelihoods and Climate Resilience Project (EALCRP). Many of the actions or activities have low or negligible potential negative impacts, such as purchase of equipment, raw materials and supplies. Some may have impacts that are typical for small construction or rehabilitation projects, such as repair to roof, buildings, or facilities. The project is determined to be of Moderate to Substantial risk (shaded box below) and therefore this ESMP was prepared.

#### Section A: Background information

Subproject Name	Renovation of the National Abattoir
Subproject Location	Layou Park, Dominica
Subproject Component	Subcomponent B.1: Restoration of Key Infrastructure in Agriculture, Livestock, and Forestry
Estimated Investment	800,000USD
Start/Completion Date	April 2023 to July 2023

#### Section B: Environmental Issue

Will the sub-project	YES	NO
Create a risk of increased soil erosion?		X
Create a risk of increased deforestation?		X
Create a risk of increasing any other soil degradation		X
Affect soil salinity and alkalinity?		X
Divert the water resource from its natural course/location?		X
Cause pollution of aquatic ecosystems by sedimentation and agro-Chemicals, oil spillage, effluents, etc.?	X	
Introduce exotic/alien plants or animals?		X
If the Involve drainage of wetlands or other permanently flooded areas?		X
Cause poor water drainage and increase the risk of water-related Diseases such as malaria?		X
Reduce the quality of water for the downstream users?	X	
Result in the lowering of groundwater level or depletion of Groundwater?		X
Create waste that could adversely affect local soils, vegetation, rivers and streams or groundwater?	X	
Reduce various types of livestock production?		X
Affect any watershed?		X
Focus on biomass/bio-fuel energy generation?		X

If answers to any of the above is 'yes', please include an ESMP in sub-project implementation.

### Section C: Socioeconomic Issues

Will the sub-project:	YES	NO
Displace people from their current settlement?		X
Interfere with the normal health and safety of the worker/employee?	X	
Reduce the employment opportunities for the surrounding communities?		X
Reduce settlement (no further area allocated to settlements)?		X
Reduce income for the local communities?		X
Increase insecurity due to introduction of the project?		X
Increase exposure of the community to communicable diseases such as HIV/AIDS? (Covid -19)		X
Induce conflict?		X
Have machinery and/or equipment installed for value addition?		X
Introduce new practices and habits?		X
Lead to child delinquency (school drop-outs, child abuse, child labour, etc.)?		X
Lead to gender disparity?		X
Lead to poor diets?		X
Lead to social evils (drug abuse, excessive alcohol consumption, crime, etc.)?		X
Will the sub-project:		
Be located within or near environmentally sensitive areas (e.g., intact natural forests, mangroves, wetlands) or threatened species?  NB: If the answer is yes, the sub-project should prepare a Natural Habitats Plan (see ESMP).		X
Adversely affect environmentally sensitive areas or critical habitats – wetlands, woodlots, natural forests, rivers, protected areas including national parks, reserves or local sanctuaries, etc.)?  NB: If the answer is yes, the sub-project should not proceed.		X
Affect the indigenous biodiversity (flora and fauna)?  NB: If the answer is yes, the sub-project should not proceed.		X
Cause any loss or degradation of any natural habitats, either directly (through project works) or indirectly?  NB: If the answer is yes, the sub-project should not proceed.		X
Affect the aesthetic quality of the landscape?		X
Reduce people’s access to the pasture, water, public services or other resources that they depend on?		X
Increase human-wildlife conflicts?		X
Use irrigation system in its implementation?  NB: If the answers to any of the above is ‘yes’, please include an ESMP with sub-project application.		X

If any of the answers above is yes, consult the ESMF for mitigation

**Section E: Pesticides and Agriculture Chemicals**

Will the sub-project:	YES	NO
Involve the use of pesticides or other agricultural chemicals, or increase existing use? Increase use of disinfectants		X
Cause contamination of watercourses by chemicals and pesticides?		X
Cause contamination of soil by agrochemicals and pesticides?		X
Experience effluent and/or emissions discharge?	X	
Export produce? Involve annual inspections of the producers and unannounced inspections?		X
Require scheduled chemical applications?		X
Require chemical application even to areas distant away from the focus?		X
Require chemical application to be done by vulnerable group (pregnant mothers, chemically allergic persons, elderly, etc.)?		X

If the answer to the above is 'yes', please consult the IPMP that has been prepared for the project

**Section F: Vulnerable and Marginalized Groups meeting requirements for OP 4.10**

Are there:	YES	NO
People who meet requirements for OP 4.10 living within the boundaries of, or near the project?		X
Members of these VMGs in the area who could benefit from the project?		X
VMGs livelihoods to be affected by the subproject?		X

If the answer to any of the above is 'yes', please consult the IPP that has been prepared for the project.

**Section G: Land Acquisition and Access to Resources**

Will the sub-project:	YES	NO
Require acquisition of land (public or private) (temporarily or Permanently) for its development?		X
Use land that is currently occupied or regularly used for productive purposes (e.g. gardening, farming, pasture, fishing locations, forests)		X
Displace individuals, families or businesses?		X
Result in temporary or permanent loss of crops, fruit trees and Pasture land?		X
Adversely affect small communal cultural property such as funeral and burial sites, or sacred groves?		X
Result in involuntary restriction of access by people to legally designated parks and protected areas?		X
Be on monoculture cropping?		X

If the answer to any of the above is 'yes', please consult the mitigation measures in the ESMF, and if need be, adopting the ARAP guidelines.

**Section H: Proposed action**

Summarize the: An ESMP is prepared to mitigate against the potential risks and impacts identified above. above:	(ii) Guidance
All the above answers are 'No'	<ul style="list-style-type: none"> <li>• If all the above answers are 'No', there is no need for further action;</li> </ul>
There is at least one 'Yes'	<ul style="list-style-type: none"> <li>• If there is at least one 'Yes', please describe your recommended course of action (see below).</li> </ul>

(iii) Recommended Course of Action

Activities and actions with moderate potential E&S risk require no further safeguards actions. Those with moderate potential risk will be managed using the general ESMF for the Emergency Agricultural Livelihoods and Climate Resilience Project (EALCRP), and will typically require that an ESMP be developed. Those with moderate to substantial potential risk will be managed using the tools in the general ESMF for the Emergency Agricultural Livelihoods and Climate Resilience Project (EALCRP) along with the additional safety guidance and information provided in this ESMP.

## ANNEX 2. WATER ANALYSIS

Characteristics of wastewater discharge will be monitored quarterly and the following parameters will be assessed:

- Faecal Coliform
- Total Coliform
- pH
- Conductivity
- Temperature
- Biological Oxygen Demand (BOD)
- Dissolved Oxygen (DO)
- Chemical Oxygen Demand (COD)
- Total Suspended Solids (TSS)
- Total nitrogen
- Total phosphorous
- Oils and grease
- Nitrates and Nitrites
- Orthophosphate

Table # 1. Indicative Values for treated sanitary sewage discharges

<b>Pollutants</b>	<b>Units</b>	<b>WB EHS Guideline Value</b>
pH	pH	6 – 9
BOD	Mg/l	30
COD	Mg/l	125
Total Nitrogen	Mg/l	10
Total phosphorus	Mg/l	2
Oils and grease	Mg/l	10
Total coliform bacteria	MPN/100 ml	400 <sup>a</sup>

<sup>a</sup> Not applicable to a centralized, municipal, wastewater treatment systems which are included in EHS Guidelines for Water and Sanitation


Source: WB EHS Guidelines

MPN: Most Probable Number

CFU: Colony Forming Units



Table # 2. Water Sample Analysis

		Dominica Water and Sewerage Company Limited 3 High Street • Roseau • Commonwealth of Dominica Tel: (767) 448-4811/2 • Fax: (767) 448-5813		
		Date : 12th January 2023		
<b>Physical /Chemical/ Microbiological Water Analysis</b>				
<b>Requested by:</b>	<b>Michael Mc Intyre</b>			
<b>Contact Number</b>	<b>275-1950</b>			
<b>Invoice Number:</b>	<b>Lab/01/21</b>			
<b>Sampling Date:</b>	<b>15th December 2022</b>			
<b>Sampling Time:</b>	<b>10:00 AM</b>			
<b>Analysis Date:</b>	<b>15th December 2022</b>			
<b>Analysis Time:</b>	<b>2:00 PM</b>			
<b>Collected By:</b>	<b>DOWASCO</b>			
<b>Sampling Location:</b>	<b>Layout</b>			
<b>RESULTS:</b>	<b>RESULTS:</b> <span style="float: right;"><i>WHO Guideline Values</i></span>			
<b>Abattoir at Layout</b>	<b>Intake</b>	<b>Stream below Abattoir</b>	<b>Maximum Recommended Concentration</b>	<b>Maximum Permissible Concentration</b>
<b>NATURE OF SAMPLE</b>	<b>Raw</b>	<b>Raw</b>		
<b>PHYSICAL PARAMETERS</b>				
pH	7.04	6.73	7.0-8.5	6.5-9.2
Temperature °C	27.5	24.4		
Turbidity NTU	20.5	25.60	5	25
Conductivity mS/cm	82.5	96.7		
<b>CHEMICAL PARAMETERS</b>				
Aluminum mg/l Al <sup>3+</sup>	0.017	0.015	0.10	1.0
Copper mg/l Cu <sup>2+</sup>	0	0	0.05	1.5
Manganese mg/l Mn <sup>2+</sup>	0.7	1.1	0.05	0.5
Iron mg/l Fe <sup>2+</sup>	0.13	0.1	0.10	1.0
Chloride mg/l Cl <sup>-</sup>	7.4	8.4	200.0	600.0
Sulphide mg/l S <sup>2-</sup>	0	0.01		
Sulphate mg/l SO <sub>4</sub> <sup>2-</sup>	0	1	200.0	400.0
Nitrite mg/l NO <sub>2</sub> <sup>-</sup> -N	0.002	0.003		
Nitrate mg/l NO <sub>3</sub> <sup>-</sup> -N	0.1	0.49		45.0
Orthophosphate mg/l PO <sub>4</sub> <sup>3-</sup>	0.09	0.19		
Total Solids mg/l	16	130.0		
<b>MICROBIOLOGICAL PARAMETERS</b>				
Total Coliforms CFU/100 ml	100,000	976,000		
E. Coli CFU/100ml	90,000	880,000	200	
<b>COMMENTS</b>				
E. Coli occurs naturally in the environment, however, it is recommended that the levels of E. Coli be monitored if water is used for recreational purposes.				

## Annex 3. Sample Code of Conduct

### **EXAMPLE OF CONTRACTOR'S CODE OF CONDUCT ENVIRONMENTAL, SOCIAL, HEALTH AND SAFETY**

#### **Our Commitment**

Our Company is committed to protecting the environment in which we operate and take pride in conducting our business in a safe and responsible manner. We recognize and accept our responsibility to develop our resources with awareness of the environmental, economic and social needs and expectations of stakeholders.

Our Organization promotes freedom of expression and open communication and we expect all employees to follow our Code of Conduct. All third-party contractors, sub-contractors, consultants and volunteers are also expected to comply with the code as a condition of their engagement with the Organization.

No operation is considered effective or complete without proper attention to safety and the environment as detailed in our Organization's Health and Safety Manual (include as Appendix 1). The health and safety of all employees and those visiting the organization/ work site are of the utmost importance. We are committed to providing and maintaining a working environment that is safe and without risk to health and safety and is committed to complying with all relevant legislative and project requirements.

All parties are expected to demonstrate a high degree of tolerance and respect for all stakeholders associated with the project, including the indigenous and local communities. The guidelines to be followed are set out in the Code of Conduct requirements below and shall apply to all associated project personnel.

#### **Code of Conduct Requirements**

This Code of Conduct for the project identifies the behaviour which we require from all project personnel and is aligned with our Organisation's Code of Conduct (add as Appendix). Our workplace is an environment where unsafe, offensive, abusive or violent behaviour will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

In this document the term "child" / "children" means any person(s) under the age of 18 years.

#### ***Code of Conduct***

*Each personnel shall comply with the following:*

1. Carry out his/her duties competently, diligently and in accordance with best practice
2. Comply with applicable laws, rules, and regulations of the Country

We will inform our personnel of the applicable legal requirements as identified in the ESMP to ensure that they are aware of the requirements. Each member of our team will be required to familiarize themselves with this document.

3. Compliance with applicable health and safety requirements to protect the local community (including vulnerable and disadvantaged groups), and the Employer's Personnel, including wearing prescribed personal protective equipment [PPE], preventing avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment

It is our duty to ensure that the health and safety requirements are strictly adhered to by all parties. As part of our employment agreement we require that all our personnel must be knowledgeable of our Health and Safety Policy and be informed of the actions required as detailed in the Health and Safety Manual which is in accordance with the ISO 45001. Through our Environmental Specialist, we will assess if any training is required and ensure that this is done. We will also equip all our personnel with the required PPE, and it is mandatory that this be used once on the project site. Safety in workplaces is an un-compromised condition and a mutual and shared responsibility for all our employees.

4. Compliance with environmental requirements identified in the ESMP including erosion control, storm water control, noise and dust control, site cleanliness and disposal of excavated materials and construction wastes
5. Compliance with COVID-19 Prevention Protocols of the Ministry of Health, Wellness and New Health Investment and other national guidance and related protocols

We will remain alert of changing outbreak conditions, locally and regionally, including as they relate to possible community spread or clusters and implement infection prevention measures accordingly. In accordance with OSHA guidelines, our ESHS Experts will periodically assess the hazards to which our personnel and the contractor's workers may be exposed, evaluate the risk of exposure and select, implement, and ensure workers use controls to prevent exposure. All project workers will be trained on the signs and symptoms of COVID-19 and an explanation of how the disease is potentially spread, including the fact that infected people can spread the virus even if they do not have symptoms.

In collaboration with the Project's Safeguards Specialists, we will implement where necessary, standard operating procedures and employee training as it relates to potential exposures. Through our Environmental Safeguards expert, we will ensure to keep updated on all the latest COVID-19 protocols of the Ministry of Health, Wellness and New Health Investments and inform our personnel to ensure these are complied with.

6. Compliance with applicable emergency operating procedures and health and safety requirements

All personnel will be informed of the emergency procedures as prescribed in the project's ESMP and the CESMP which must be strictly complied with.

7. Duty to report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent danger to his/her life or health

Each personnel must assume responsibility for his/ her own health and safety and should report any concerns immediately to the Project Manager/ Site Supervisor, Resident Engineer or ESHS Experts.

8. Respecting reasonable work/ site instructions (including regarding environmental and social norms)

All our personnel are required to be aware of related work/ site instructions and are expected to comply. This is a condition of employment and subject to disciplinary measures if violated.

9. The use of illegal substances

Our Organization has a zero tolerance for the use of illegal substances - all drugs, alcohol and any controlled substances or medicines. This may result in immediate dismissal if violated. If required, we are prepared to engage the services of a Medical Professional to perform testing for any illegal substances.

10. Sanitation requirements (for example, to ensure workers use specified sanitary facilities provided by their employer and not open areas)

Adequate sanitary facilities and well-equipped hand-washing stations are expected to be provided by the contractor on this project. It is also expected that the contractor will ensure that these facilities are frequently cleaned and sanitized especially given the risks of COVID-19, as a prevention measure. All project personnel, including the contractor's, are required to use these facilities and will be reminded of this should the need arise.

11. Non-Discrimination and respect in dealing with the Indigenous Peoples, the local community (including vulnerable and disadvantaged groups), the Employer's Personnel, the Contractor's Personnel and other related Project Personnel (for example on the basis of family status, ethnicity, race, gender, religion, culture, language, marital status, birth, age, disability, or political conviction)

Our Organisation firmly believes in respect for all and that everyone should be treated fairly. We will ensure that our personnel are aware of the requirements as prescribed in these project documents and abide by them as a condition of employment. We commit to working in close collaboration with all Social Specialists on this project to ensure that there is non-discrimination and respect for all stakeholders on the basis of gender, age, physical or mental disability, race, language, culture, political affiliation, philosophic or religious beliefs or any other reason.

Interactions with community members and any affected persons (for example to convey an attitude of respect and non-discrimination, including to their culture and traditions)

All employees are expected to fulfill their duties with integrity and respect toward customers, stakeholders, and the community. We are committed to the highest social performance standards in a manner that respects the environment, culture and customs of the communities within the area of direct and indirect influence of the project. Any complaints received from communities or stakeholders will be investigated in accordance with the Project's Grievance Redress Mechanism.

12. Sexual harassment (for example to prohibit use of language or behavior, in particular towards women or children, that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate)
13. Violence, including sexual and/or gender-based violence (for example acts that inflict physical, mental or sexual harm or suffering, threats of such acts, coercion, and deprivation of liberty)
14. Exploitation including sexual exploitation and abuse (for example the prohibition of the exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading behavior, exploitative behavior or abuse of power)

Sexual harassment, violence, including gender based, and exploitation are behaviors which are expressly prohibited in our Organization. These are identified as a form of harassment based on the misuse of power in human relationships and can be defined as behaviors intended to disturb, threaten or upset. Some examples of behaviors associated with these elements are listed in Appendix 1. Any complaints or reports received from communities or stakeholders in this regard will be investigated by our Social Specialist in accordance with the Project's Grievance Redress Mechanism.

15. Protection of children (including prohibitions against abuse, defilement, or otherwise unacceptable behavior with children, limiting interactions with children, and ensuring their safety in project areas)

The rights of the child shall be protected and any observed or reported cases of infringement will be swiftly investigated and required measures taken if deemed necessary. Our Social Specialist will collaborate with the Ministry of Youth Development and Empowerment, Youth at Risk, Seniors Security and Dominicans with Disabilities; Social Welfare Division in this regard.

The Contractor ESHS Expert should provide training related to the environmental and social aspects of the Contract, including on health and safety matters, sexual exploitation and abuse and sexual harassment

Our ESHS Experts will provide short training sessions and concise information leaflets to assist personnel in being informed of the environmental, social and health and safety aspects of the project.

16. Avoidance of conflicts of interest (such that benefits, contracts, or employment, or any sort of preferential treatment or favors, are not provided to any person with whom there is a financial, family, or personal connection)

Our Company shall deal fairly and lawfully with all our Clients in accordance with our Business Ethics. We expect our employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties. Employees are encouraged to perform self-checks when in doubt or faced with a difficult situation to ensure that decisions are lawful.

17. Avoidance of issues associated with influx of labor, both social and environmental

These issues include many of those identified in this Code, such as sexual exploitation, sexual harassment or gender-based violence. Both our Environmental Specialist and Social Specialist will conduct the requisite monitoring to ensure that these issues are avoided. If any issue should arise or complaint receive, it will be investigated, and the necessary action taken. A report will also be prepared and follow-up done.

18. Protection and proper use of property (for example, to prohibit theft, carelessness or waste)

In accordance with our Organization's Code each employee must ensure that their actions comply with and are within the meaning and intent of all applicable laws and regulations.

19. Duty to report violations of this Code

Each employee has a duty to report any violations or suspected violations of the code. The person by virtue of this Code will be protected from retaliation. Any reports of violations received will be investigated.

20. Non-retaliation against workers who report violations of the Code, if that report is made in good faith.

Our Organization is committed to the highest standards of good governance, transparency, honesty, integrity, and accountability. Any of our employees who report unethical conduct or violation of the Code are protected from reprisal. Any reprisal or attempted reprisal against an employee who makes a report in accordance with the Code is considered to be in breach of the Code of Business Conduct. If any employee should feel that they have been discriminated against as a result of reporting unethical conduct or violation of the Code, there is an opportunity to report the discriminatory actions directly to the Company's Director.

Our Personnel are not allowed to smoke illegal substances (drugs) or make open fire in the Project area, including project's vehicles.

Our Personnel are not allowed to carry firearms, explosives, ammunition, or other arms in the Project Area, including Project's vehicles.

Our personnel are not allowed to have pets in the Project area.

Our personnel are not allowed to fish, hunt or remove vegetation from the Project area or surrounding properties.

Our Personnel are not allowed to use open areas instead of the designated sanitary facilities.

Any damage caused by the Project to any property in the Project Area must be immediately informed to the Representative of the Contractor in the Project.

### **Implementation of the Code of Conduct**

The project requires that implementation of the Code of Conduct detail the measures to ensure that there is compliance, these include how the Code will be:

- Communicated to Personnel
- Introduced into the Conditions of Contract
- Violations will be addressed
- Monitored and Reported for Compliance
- Communicated to Communities in case of concerns

Our ESHS Experts on this project will work in close collaboration with the Project's Environmental Safeguards Specialist and Social Safeguards Specialist to ensure compliance with the Code of Conduct during works.

### ***Communication to Personnel***

All employees must be open to communication with their colleagues, supervisors or team members. We promote freedom of expression and open communication, but we expect all employees to follow our Code of Conduct. The Code of Conduct for the project will be provided to each personnel on the project and will also be available in hard copy in the project office.

Our ESHS Specialists will provide short training sessions and concise information leaflets to assist personnel in being informed of the environmental, social and health and safety aspects of the project. Training for workers will include awareness of hazards in the project area, health and safety procedures, emergency response, first-aid, incident reporting and accident prevention. Safety and other ESHS issues will also be highlighted at tool-box meetings and monthly project meetings by the Project Manager, Resident Engineer and/or ESHS Specialists. ESHS orientation will also be done for new personnel.

Personnel will have an open communication channel through our ESHS Experts or other designated person to be able to ask questions and make recommendations at any time during the project implementation.

### ***Engagement Conditions and Consequences of Code Violations***

All our personnel on the Project are personally responsible for ensuring that their behavior complies with this Code of Conduct. The Code of Conduct is clearly articulated in this document and is written in plain language (English). As part of the conditions of engagement, each employee on this project is expected to sign an agreement indicating that they have:

- Received a copy of the code
- Had the code explained to them
- Acknowledged that adherence to this Code of Conduct is a condition of employment; and
- Understood that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities

Clarifying queries and obtaining advice – Our personnel may consult with our Compliance Officer if there are any questions or concerns about this Code of Conduct, or if advice is needed. Our Environmental Specialist and Social Specialist on this project will also be available to provide guidance on the Code.

We will take appropriate investigative action where this Code is breached. Our Organization may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our Code of Conduct. Disciplinary actions will vary depending on the violation. Possible consequences include:

- Reprimand
- Demotion
- Suspension or termination for more serious offenses
- Detraction of benefits for a definite or indefinite period
- Legal action may also be taken

### ***Monitoring and Reporting***

If any person observes behaviour that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done in either of the following ways:

1. Contact [*enter name of the Consultant’s Social Safeguard’s Expert and Environmental Safeguard’s Expert or another individual designated by the Company to handle these matters*] in writing at this address [*insert address*] or by email [*insert email address*] or by telephone at [*insert telephone #*] or in person at [*insert designated location and available times*]
2. Call [*insert telephone #*] to reach the Project’s hotline (*if any*) and leave a message including contact number and brief information of issue
3. Utilise the Project’s Grievance Redress Mechanism (GRM), available via telephone [*insert #*], in person at the PCU Office [*insert address*], through the project website [*insert web address*] or via the GRM App [*insert link, if available*]

The person’s identity will be kept confidential, unless reporting of the allegation is mandated by law of the Commonwealth of Dominica. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action in collaboration with the Project. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.



There will be no retaliation against any person who raises a concern in good faith about any behaviour prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

**Responsibility** - Overall responsibility for monitoring and reporting lies with our Project Manager/ Site Supervisor, Resident Engineer and Social Specialist and Environmental Specialist or another designated representative on this project. Periodic assessments will be done by these designated personnel to ensure compliance with the Code of Conduct. Review will also be done at least every six (6) months or as may be necessary to ensure the Code remains current.

Reports will be done monthly as part of the project's progress reporting or immediately if there is an incident. Other reports may be prepared as requested by the Project.

### **Communication to Communities**

In collaboration with the Project's Social Safeguards Specialist and Environmental Safeguards Specialists we will if required:

- Inform the community of our roles and responsibilities on the project
- Inform the community and stakeholders of the requirements of the Code of Conduct, measures for compliance and our commitment to upholding the Code
- Respond to the concerns and views of stakeholders in a timely and open fashion
- Engage interested parties, when necessary, to discuss our operations and the relationship to affected communities and the environment
- Provide clear and candid environmental information about the operations of the Project and our responsibilities.

## **Appendix 1**

### **Behaviours Constituting Sexual Exploitation and Abuse and Behaviors Constituting Sexual Harassment**

*The following non-exhaustive list is intended to illustrate types of prohibited behaviours:*

**Examples of Sexual Exploitation and Abuse** include, but are not limited to:

- Consultant's Personnel tells a member of the community that he/she can get them jobs on the project work site (e.g. cleaning, masonry) in exchange for sex or sexual acts
- Consultant's Personnel says that he can give priority for job considerations to women in exchange for sex
- Consultant's Personnel rapes, or otherwise sexually assaults a member of the community or project stakeholder
- Consultant's Personnel denies a person access to the site unless he/she performs a sexual favor

- Consultant's Personnel tells a person applying for employment under the Contract that he/she will only hire him/her if he/she has sex with him/her

**Examples of Sexual Harassment or Sexual Misconduct** include, but are not limited to:

- Consultant's Personnel comments on the appearance of another personnel's or community member (either positive or negative) and sexual desirability
- When a Consultant's Personnel complains about comments made by another Consultant's/ Contractor's Personnel on his/her appearance, the other Consultant's/ Contractor's Personnel comment that he/she is "asking for it" because of how he/she dresses
- Unwelcome touching of a Consultant's/ Contractor's or Employer's Personnel or community member by another Consultant's/ Contractor's Personnel
- Consultant's Personnel tells another Consultant's/ Contractor's Personnel that he/she will get him/her a salary raise, or promotion if he/she sends him/her naked photographs of himself/herself.

FOR CONTRACTOR'S PERSONNEL:

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact [enter name of Contractor's contact person(s) with relevant experience (including for sexual exploitation, abuse and harassment cases) in handling those types of cases] requesting an explanation.

Name of Contractor's Personnel: *[insert name]*

Signature: \_\_\_\_\_

Date (day/month/year/): \_\_\_\_\_

Counter signature of authorized representative of the Contractor:

Signature: \_\_\_\_\_

Date (day/month/year/): \_\_\_\_\_